

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, ACCIPITER HOLDINGS DAC,
CARLYLE AVIATION MANAGEMENT
LIMITED, MAVERICK AVIATION
HOLDINGS LIMITED, MANCHESTER
AVIATION FINANCE S.A.R.L., VERMILLION
AVIATION HOLDINGS LIMITED, WELLS
FARGO TRUST COMPANY, N.A., solely in its
capacity as OWNER TRUSTEE, and UMB
BANK, N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

Case No.: 1:22-cv-02943 (PAE)

**NOTICE OF MOTION TO ALTER OR AMEND THE COURT'S JULY 18, 2023 ORDER
GRANTING PLAINTIFF'S APPLICATION TO CONVERT TEMPORARY
RESTRAINING ORDER TO PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that, upon the memorandum of law submitted herewith, Defendants Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee, and UMB Bank, N.A., solely in its capacity as Owner Trustee, hereby moves this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, 40 Foley Square, Courtroom 1305, New York, New York 10007, for an order pursuant to Federal Rule of Civil Procedure 59(e) altering or amending the Court's July 18, 2023 Order, ECF No. 92, granting Plaintiff Frontier's application to convert temporary restraining order to preliminary injunction, ECF No. 71, and granting such further relief as the Court deems just and proper.

Dated: August 2, 2023
New York, New York

MILBANK LLP

/s/ Jed M. Schwartz

Jed M. Schwartz
Samantha A. Lovin
Emily Werkmann
55 Hudson Yards
New York, New York 10001
Tel: (212) 530-5000
JSchwartz@milbank.com
SLovin@milbank.com
Ewerkmann@milbank.com

Attorneys for Defendants Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee, and UMB Bank, N.A., solely in its capacity as Owner Trustee.